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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5WCC-TUB-8

NOV 02 1990

George Schillinger
General Manager
Sauget Sanitary Development and Research Association
One American Bottoms Road
Sauget, Illinois 62201

Re: Pretreatment Audit Conducted
June 5-6, 1989

Dear Mr. Schillinger:

Enclosed for your review is a copy of the subject audit report. Section two of the report is a "Summary of Findings, Required Actions, and Recommendations." In all cases where Findings of Deficiencies are noted, the audit report identifies Required Actions and Recommended Actions to correct said deficiencies.

Please review the report and (1) identify for our records any deficiencies that have been corrected, and any Required or Recommended Actions that have already been taken, including the date(s) the Required or Recommended Action(s) was (were) taken; (2) provide a schedule for correction of the remaining deficiencies, including specific timetables or dates for each Required Action; and (3) your proposed course of action, including a timetable, for each Recommended Action. It is requested that you provide this within 30 days of receipt of this letter.

Please note that while the audit report stresses the need for adoption of local limits for ammonia, we recognize that this process will be resolved via our consent decree negotiation.

In the meantime, if you have any questions, please contact me at 312-886-6760.

Very truly yours,

Michael J. Mikulka, Chief
Compliance Section

Enclosure

RECEIVED
NOV 5 1990
AMERICAN BOTTOMS TREATMENT PLANT

cc: Rich Warrington, IEPA
Ken Rogers, IEPA
Susan Franzetti, Gardner Carton and Douglas
Harold Baker, Attorney for the Village of Sauget
Jim Morgan, Illinois Attorney General

C05156

AUDIT OF PRETREATMENT PROGRAM
VILLAGE OF SAUGET, ILLINOIS

October 1990

Prepared by:

U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

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APPENDICES

1. INTRODUCTION

On June 5-6, 1989, the U.S. Environmental Protection Agency (U.S. EPA), with the assistance of the Illinois Environmental Protection Agency (IEPA), conducted an on-site audit of the Village of Sauget, Illinois, Industrial Pretreatment Program. Audit participants are listed on page A-1 of the audit checklist.

The audit consisted of interviews with Village officials and their contractors, and reviews of Industrial User (IU) files. A copy of the audit checklist may be found in Appendix A. Additional information is presented in Appendices B through D.

2. SUMMARY OF FINDINGS, REQUIRED ACTIONS AND RECOMMENDATIONS

2.1 Legal Authority and Control Mechanisms

Findings of Deficiencies

The Village's pretreatment ordinance provides the Village with adequate legal authority to implement its pretreatment program. The ordinance authorizes the use of permits to control discharges to the POTW. As of May 1, 1989, the Village had issued 8 permits to the original 8 significant industrial users (SIU) identified in the program. Two additional SIUs have been identified and need to have permits issued to them.

The Village is issuing permits, however, that are not consistent with categorical standards, specifically for SIUs regulated by 40 CFR 414.

The pretreatment program contains Standard Operating Procedures for enforcement responses. The Village is not following these procedures in all cases.

The control mechanisms for, at a minimum, Pfizer (now Harcros--All references to Pfizer mean Harcros) and Monsanto need to contain limits for ammonia, since the ammonia discharges from these two companies cause/contribute to Sauget's violations of ammonia water quality standards and 1 TU_a limit.

It was noted that the Village occasionally has difficulty gaining entrance to all the SIUs without going through specific entrance procedures developed by the individual SIUs. We recommend that the Village of sit down with the SIUs and develop a pre-approved plan or blanket approval so that entry may be gained more quickly.

Required Actions

1. The Village must issue permits for Rogers Cartage Co. and Clayton Chemical Co.

2. The Village must modify or reissue the permits for the facilities regulated by 40 CFR 414 to include mass-based limits.

3. The Village must follow its approved Standard Operating Procedures and escalate enforcement response, particularly for Cerro Copper, Big River Zinc, LanChem, Monsanto, and Pfizer.

4. The Village must eliminate compliance schedules from Cerro Copper and Big River Zinc permits.

5. The Village must adopt local limits for ammonia to be applied to Monsanto, Pfizer, and Trade Waste. A proposal has been submitted to EPA in this regard.

6. The control mechanisms for Monsanto and Pfizer must be modified to establish limits for ammonia.

Recommended Actions

1. We recommend that the Village adopt a pre-approval plan or blanket approval for to enhance quick right of entry to all SIUs.

2.2 Application of Pretreatment Standards

Findings of Deficiencies

The Village ordinance contains a local limit for iron that is applied to Pfizer. The Village is in the process of developing additional local limits based on extensive sampling. The most critical need appears to be an ammonia limit to be applied to Monsanto, Pfizer, and possibly Trade Waste. The Village's local limits proposal for ammonia was submitted in March 1989, and has been the subject of negotiations.

The Village uses permits as control mechanisms. Production-based standards required by 40 CFR 414 are not being applied correctly to Monsanto, Ethyl Chemical and LanChem.

Additionally, the permits for Big River Zinc and Cerro Copper contain compliance schedules that allow for attainment of categorical limits beyond statutory deadlines.

Required Actions

1. The Village must revise the permits for Monsanto, Ethyl Chemical, and LanChem to contain mass-based limits in accordance with 40 CFR 414.

2. The Village must modify the permits for Cerro Copper and Big River Zinc to require immediate compliance with categorical standards.

3. The Village must amend the Monsanto and Pfizer permits to incorporate a local limit for ammonia. This may also be necessary for Trade Waste. The local limits issue for ammonia is close to resolution via negotiations as part of the Federal litigation.

2.3 Compliance Monitoring

Findings of Deficiencies

The Village has an adequate compliance monitoring program. However, it was difficult to tell whether IU reports were being reviewed and assessed for compliance. Therefore, reports must be reviewed in a timely fashion and the results documented.

It is recommended that the inspection reports contain copies of process logs and a camera be used to record visual observations. Also, chemical storage areas should be inspected and an evaluation of hazardous waste generation should be made.

Required Actions

1. The Village must review IU reports in a timely fashion and document the results of such reviews.

Recommended Actions

1. IU inspection reports should contain process logs and a camera should be used to document visual observations.

2. IU chemical storage areas should be inspected.

3. IU hazardous waste generation should be evaluated.

2.4 Enforcement

Findings of Deficiencies

The Village's program contains Standard Operating Procedures for enforcement response. However, the Village has not been following the procedures in all cases. The Village has taken enforcement action against Cerro Copper. The Village, however, needs to escalate enforcement actions against Big River Zinc and LanChem.

The Village has failed to initiate enforcement to prevent pass through of ammonia. (Special Condition 10 and 11 of the permits.)

Required Actions

1. The Village must escalate enforcement actions against Big River Zinc and LanChem in accordance with the approved Standard Operating Procedures.

2. The Village must initiate enforcement actions against Monsanto and Pfizer for pass through violations due to their ammonia contributions.

2.5 Data Management and Public Participation

Findings of Deficiencies

The Village's program has adequate procedures for data management and public participation. Files were organized and contained appropriate information except compliance status could not always be ascertained. The Village has procedures that address confidentiality, but they are not being followed in all cases.

The auditors also found minor deficiencies and have made recommendations below.

Required Actions

1. Handling of confidential information must be in accordance with the approved procedures.

Recommended Actions

1. Letters received should be date stamped upon receipt.
2. Files should have signed copies of letters sent.
3. If letters are sent certified, they should have the certified letter number.

2.6 Program Resources

Findings of Deficiencies

The Village appears to have adequate resources to effectively implement all elements of its approved program. The Village has been using contractor assistance in implementing its program. Funding for the program has decreased due to initial start up costs not being incurred in the second year and some additional costs are being reimbursed by the industrial users.

APPENDIX A

POTW PRETREATMENT PROGRAM
AUDIT CHECKLIST

A/H76d/INTRO.PAC

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

CHECKLIST CONTENTS:

X	Section I:	Control Authority Background Information
X	Section II:	POTW Pretreatment Program Fact Sheet
X	Section III:	Legal Authority and Control Mechanism
X	Section IV:	Application of Pretreatment Standards
X	Section V:	Compliance Monitoring
X	Section VI:	Enforcement
X	Section VII:	Data Management and Public Participation
X	Section VIII:	Program Resources
X	Section IX:	POTW File Review
X	Section X:	Evaluation and Summary
X	Attachments:	Supporting Documentation for Audit Checklist

POTW NAME: VILLAGE OF SAUGET, ILLINOIS

DATE(S) OF ON-SITE REVIEW: JUNE 5-6, 1989

Participants:

	Name	Title	Organization	Phone Number
1)	DAVID RANKIN (Principal Reviewer)	REG. PRET. COORD.	EPA REGION V	312-353-2105
2)	JOHN COLLETTI	ENV. ENG.	EPA REGION V	312-886-6106
3)	ANNE WEINERT	ENV. ENG.	EPA REGION V	312-886-2110
4)	NICK MAHLANDT		IEPA COLLINSVILLE	618-346-5120
5)	GEORGE SCHILLINGER	GEN. MNGR. SSDRA	ABRIF	618-337-1710
6)	TOM THOMPSON	ASSOCIATE	HORTON & SHIFTON, INC.	314-531-4321
7)	KIMBERLY DOMINIC	ENGINEER	HORTON & SHIFTON, INC.	314-531-4321

A/H76d/SEC1.PAC

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION I: CONTROL AUTHORITY BACKGROUND INFORMATION

INSTRUCTIONS: Complete background information prior to on-site audit.

A. General Information

1) Name of Permittee: VILLAGE OF SAUGET, ILLINOIS

2) Mailing Address: C/O SAUGET SANITARY DEVELOPMENT & RESEARCH ASSOCIATION
ONE AMERICAN BOTTOMS ROAD
SAUGET, ILLINOIS 62201

3) Pretreatment Contact Name: GEORGE R. SCHILLINGER

Title: GENERAL MANGER

Telephone: 616-337-1710

4) Frequency of POTW pretreatment program reporting to Approval Authority (e.g., annually, quarterly): QUARTERLY

5) Date of last POTW pretreatment program report: MAY 1,1989

6) Date of last Audit: N/A Circle type: PCI Audit

7) Comments on results of last PCI/Audit and last pretreatment program report:
N/A

8) Number of Treatment plants: TWO

NPDES permit number(s)	Plant name(s)
IL0065145	AMERICAN BOTTOMS REGIONAL WASTEWATER TREATMENT FACILITY
IL0021407	SAUGET PHYSICAL/CHEMICAL WASTEWATER TREATMENT PLANT

A/H76d/SEC1.PAC

SECTION I: CONTROL AUTHORITY BACKGROUND INFORMATION (Continued)
B. POTW Treatment Plant Information
(Complete this section for each treatment plant operated under NPDES permit by the POTW)

1) Name of Treatment Plant: AMERICAN BOTTOMS REGIONAL WASTEWATER TREATMENT FACILITY (ABRWTF)

2) Location Address: # 1 AMERICAN BOTTOMS ROAD, SAUGET, ILLINOIS 62201

3) NPDES Permit Number: IL0065145 Expiration Date: 07/31/90

4) POTW Treatment Plant Wastewater Flow
Design Daily Average (Dry Weather): 27 mgd
Actual Daily Average (Dry Weather): 16 mgd MAY 88
Design Peak: 52 mgd APR 89

5) Sewer System: 15 % Separate 85 % Combined FLOW BASIS

6) Percent Industrial Flow: 52 %

7) Level of Treatment:
Primary YES
Secondary YES
Tertiary

8) Type of Process(es):
SCREENING, GRIT REMOVAL, PRIMARY CLARIFICATION, ACTIVATED SLUDGE WITH PAC, CHLORINATION, SLUDGE DEWATERING

9) Method of Sludge Disposal:

		10) Quantity of Sludge:	
	Land Application		dry tons/yr
	Incineration		dry tons/yr
x	Landfill	3,030	dry tons/yr MAY 88
	Public Distribution		dry tons/yr APR 89
	Other (specify)		dry tons/yr

11) Receiving Stream Name: MISSISSIPPI RIVER

12) Stream Classification: GENERAL USE

13) 301(h) Waiver Applied for: ___ Yes X No, Granted: ___ Yes ___ No
Date of Application:
Date Approved or Denied:

14) If the treatment plant is not in regular compliance with its NPDES permit, list the parameters commonly violated and the suspected cause(s):

Parameters Violated	Cause(s)
BOD	UNKNOWN
TSS	UNKNOWN
WHOLE EFFLUENT TOXICITY LIMIT OF ITUA	HIGH LEVELS OF ORGANICS AND AMMONIA
IRON	HARCROS (PFIZER)
MERCURY	MONSANTO
PHENOLS	MONSANTO & PFIZER
COLOR	ORGANICS FROM P/C PLANT
FECAL COLIFORM	AMMONIA CHLORINE DEMAND
AMMONIA STATE WQ STANDARD	MONSANTO AND PFIZER

Section I Completed By: [signature] Date: 10-26-90

A/H76d/SEC1.PAC

SECTION I: CONTROL AUTHORITY BACKGROUND INFORMATION (Continued)

B. POTW Treatment Plant Information

(Complete this section for each treatment plant operated under NPDES permit by the POTW)

1) Name of Treatment Plant: PHYSICAL/CHEMICAL WASTEWATER TREATMENT PLANT (P-CHEM

2) Location Address: 10 MOBILE STREET, SAUGET, ILLINOIS 62201

3) NPDES Permit Number: IL0021407 Expiration Date: 07/31/90

4) POTW Treatment Plant Wastewater Flow MAY 88 - APR 89

Design Daily Average (Dry Weather): 11.5 mgd
Actual Daily Average (Dry Weather): 7.0 mgd
Design Peak: 13.0 mgd

5) Sewer System: _____ % Separate 100 % Combined

6) Percent Industrial Flow: 98 %

7) Level of Treatment:

Primary* X
Secondary _____
Tertiary _____
*PLUS METALS REMOVAL

8) Type of Process(es):

GRIT REMOVAL, SCUM REMOVAL, BAR-SCREENS, NEUTRALIZATION, FLOCCU-LATION, CLARIFICATION, VACUUM FILTRATION

9) Method of Sludge Disposal:

_____ Land Application
_____ Incineration
x Landfill
_____ Public Distribution
_____ Other (specify)

10) Quantity of Sludge: MAY 88 - APR 89

_____ dry tons/yr
_____ dry tons/yr
2707 dry tons/yr
_____ dry tons/yr
_____ dry tons/yr

11) Receiving Stream Name: FLOWS TO THE ABRWTF

12) Stream Classification: N/A

13) 301(h) Waiver Applied for: ___ Yes X No, Granted: ___ Yes ___ No
Date of Application: _____
Date Approved or Denied: _____

14) If the treatment plant is not in regular compliance with its NPDES permit, list the parameters commonly violated and the suspected cause(s): NA

Parameters Violated	Cause(s)
_____	ALL FLOWS ROUTED TO ABRWTF EFFECTIVE 11/87
_____	
_____	
_____	

Section I Completed By: _____ Date: 10-26-90
Title: _____ Telephone: _____

A/H76d/SEC2.PAC

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION II: POTW PRETREATMENT PROGRAM FACT SHEET

INSTRUCTIONS: Complete entire Fact Sheet prior to on-site audit. Parts B through H should be completed based on the approved program documents identified in Part A.

A. Inventory of Documents Comprising the Approved Pretreatment Program

1) Original Pretreatment Program Submission Approval Date: JUNE 8, 1988

2) Does NPDES permit contain pretreatment requirements or conditions?
X Yes _____ No

3) List in chronological order all program modification requests. Indicate whether request was contained in a letter, annual report, or other, and whether request was approved, denied, or not yet acted upon.

Date of Request	Where Contained	Brief Description of Nature of Request	Approval Authority Response and Date
N/A			

4) Is the POTW currently operating under any consent decree, administrative order or other document which contains pretreatment program requirements?

X Yes _____ No

Interim order dated 3/17/89.

B. Legal Authority and Control Mechanism

1) POTW authority to implement and enforce pretreatment standards and requirements is contained in (cite legal authority):
VILLAGE OF SAUGET PRETREATMENT ORDINANCE NO. 567

Date Enacted/Adopted 1/26/ENACTED
2/06/88 EFFECTIVE

2) Are all Industrial Users (IUs) located within the jurisdictional boundaries of the POTW? _____ Yes X No

If no, what type of legal agreement provides the authority to enforce pretreatment standards in outlying jurisdictions?

X interjurisdictional agreements
_____ contracts with IUs
X other (describe): ILLINOIS MUNICIPAL CODE OF 1961 SEC. 11-141-7; ILLINOIS ENVIRONMENTAL PROTECTION ACT SECTION 46

SECTION II: POTW PRETREATMENT PROGRAM FACT SHEET (Continued)

3) If a multijurisdictional situation exists, do the approved program documents specify who should have lead responsibility for carrying out each aspect of the pretreatment program in the outlying jurisdiction?
__X__ Yes _____ No _____ N/A

If yes, identify who undertakes the following (POTW or outlying jurisdiction):

establishing local limits VILLAGE OF SAUGET
issuing SIU control documents CONTROL AUTHORITY
receiving reports (BMRs, etc.) VILLAGE OF SAUGET
sampling and analysis VILLAGE OF SAUGET
inspections of SIUs CONTROL AUTHORITY
compliance tracking VILLAGE OF SAUGET
enforcement VILLAGE OF SAUGET
pretreatment program administration VILLAGE OF SAUGET

4) What IU control mechanisms are intended to be used by the POTW?
__X__ permits
_____ contracts
_____ orders
_____ sewer use ordinance (SUO) only
_____ other (describe) _____

5) According to the approved program documents, approximately how many IU permits or other control documents were intended to be issued by the POTW?
ISSUED 8 SIU PERMITS AS 5-1-89 AND IN THE PROCESS OF ISSUING TWO ADDITIONAL PERMITS.

6) How often are the control documents intended to be reissued? 1-5 YEARS

C. Industrial User Characterization

1) How many IUs were identified in each of the following groups?
AS OF MAY 1, 1989
__6__ categorical IUs
__4__ significant* noncategorical IUs
__0__ other regulated** noncategorical IUs
__53__ other nondomestic users
__63__ TOTAL
Numbers came from PCI report dated 12/17/86

* The POTW has defined "significant" IU to mean: SEE DEFINITION IN SEC. 2.2 OF ORDINANCE NO. 567 AT PAGES 10 AND 11

** By "other regulated" IUs is meant IUs that the POTW surcharges, inspects, controls through a permit, or otherwise regulates, but which are not considered significant for purposes of the pretreatment program.

The POTW's "other regulated" IUs include: N/A

2) Does the POTW intend to update its industrial waste survey (IWS)?

SECTION II: POTW PRETREATMENT PROGRAM FACT SHEET (Continued)

D. Local Limits

1) Does the program submission indicate historical problems caused by IU discharges?

__X__ inhibition/upset* (describe) HIGH ORGANICS CONTRIBUTE TO ITUA VIOLATIONS

__X__ pass through (describe) IRON IN AMERICAN BOTTOMS' PLANT EFFLUENT

_____ sludge (describe) _____

__X__ other* (describe) HIGH NH_3-N CONTRIBUTES TO ITUA VIOLATIONS AND STATE WATER QUALITY STANDARD VIOLATIONS. * PROBLEMS EXISTED, BUT NOT INDICATED IN PROGRAM SUBMISSION.

2) Attach a copy of the local limits contained in the approved program submission __X__ attached

_____ no local limits exist

3) How were the local limits derived? FINAL LOCAL LIMITS, NOT YET PROPOSED

__X__ technical basis (describe) BASED ON SAMPLING AND ANALYSIS OF PLANT EFFLUENT AND CONTRIBUTORY INDUSTRY

_____ preexisting in ordinance, basis unknown

_____ other (describe) _____

4) Does the POTW's NPDES permit(s) contain limits or monitoring requirements for any toxic/priority pollutants? __X__ Yes _____ No

If yes, list pollutants: SEE ATTACHED PERMIT

If yes, how many analyses per year for:

	Influent	Effluent	Sludge
	P-CHEM EFFLUENT		
metals	_____	1,820	N/A
organics	N/A	4	N/A
bimonitoring		_____	
EP toxicity			N/A

E. Standards and Requirements for Industrial Users

1) Do the approved program documents indicate that the POTW has IUs subject to any of the following requirements (indicate approximate number, if known):

	Yes	No	Approximate Number
a. combined wastestream formula	X	___	6
b. production-based categorical standards	X	___	6
c. total toxic organic (TTO) limits	X	___	2
d. solvent management plans	___	X	_____

2) Does the POTW have approval to grant removal credits to categorical IUs? _____ Yes __X__ No If yes, list parameters: _____

3) Does the POTW have a spill prevention and control plan to address toxic discharges from IUs? __X__ Yes _____ No

4) Does the program include procedures for accepting hazardous wastes by truck, rail, or dedicated pipeline? _____ Yes __X__ No _____ N/A
SEE SEC. 3.10 OF ORDINANCE NO. 567 AT PAGE 23 AND SEC 4 OF ORDINANCE NO 567 AT PAGES 25 THROUGH 39

SECTION II: POTW PRETREATMENT PROGRAM FACT SHEET (Continued)

5) Does the program include procedures for notifying IUs of Resource Conservation and Recovery Act (RCRA) obligations? __X__ Yes _____ No

F. Compliance Monitoring

1) Does the program submission establish a proposed frequency for conducting:

		Minimum Frequency (times/yr/IU)	
		Categorical	Significant Noncategorical
__X__	onsite IU inspections	**	**
__X__	POTW monitoring of IUs	*	*
__X__	self-monitoring by IUs	*	*
__X__	reporting by IUs	*	*

* VARIES WITH FLOW - SEE ATTACHMENT
** AT DISCRETION OF CONTROL AUTHORITY

G. Enforcement

1) Check those compliance/enforcement options that are available to the POTW in the event of IU noncompliance:

__X__ notice or letter of violation
__X__ establishment of IU compliance schedule
__X__ revocation of permit
__X__ injunctive relief
__X__ fines; maximum amount: $1,000/day/violation
__X__ criminal penalties
__X__ termination of service

2) Particular IUs being problem dischargers.

	IU Name	Reason
✓	PFIZER	HIGH IRON CONCENTRATIONS/AMMONIA
✓	MONSANTO	ORGANICS

H. POTW Resources

1) How many full-time equivalents (FTEs) will be committed to the POTW's pretreatment program? __10__ FTEs
(An FTE is sometimes referred to as a man-year. For example, two persons working half-time all year are equivalent to one FTE.)

2) Which of the following equipment is to be available for pretreatment program implementation? Indicate the number of units where possible.

		Number
__X__	vehicle(s)	6
__X__	automatic sampler(s)	23
__X__	flow meter(s)	16
__X__	portable pH meter(s)	2
__X__	gas detector(s)	6
__X__	self contained breathing units	7
__X__	other safety equipment (describe)	PROTECTIVE CLOTHING, SAFETY GLASSES, WORK SHOES, FIRST AID KITS, FIRE EXTINQUISHERS, RESPIRATOR KITS, PORTABLE BLOWERS, SAFETY HARNESS

SECTION II: POTW PRETREATMENT PROGRAM FACT SHEET (Continued)

3) How does the POTW intend to fund the pretreatment program?

		Percent of Total Funding
____	POTW general operating fund	____
__X__	IU permit fees	< 1%
__X__	monitoring charges	____
____	industry surcharges	____
__X__	other (describe) ____	99% SEE SEC. 5, SUB-SEC. 3.2 OF PRETREATMENT PROGRAM
	TOTAL	100%

4) What is the total estimated level of annual funding required to implement the POTW pretreatment program?
$640,800* year.

* FIRST YEAR COST

Other Supporting Comments:

D.3 - THE POTW IS CONDUCTING A FATE AND EFFECT ANALYSIS TO DETERMINE THE NEED FOR LOCAL LIMITS. SECTION 3.3.3 OF ORDINANCE NO. 567 AT PAGE 18 CONTAINS A LOCAL LIMIT FOR IRON FOR PFIZER INC.

AMMONIA LIMIT ANALYSIS SUBMITTED 3/89 RECOMMENDS LOAD LIMITS FOR PFIZER, MONSANTO AND TWI AND A 50 MG/L CONCENTRATION LIMIT FOR ALL OTHER USERS.

Section II Completed By: _____ Date: 10-26-90
Title: _____ Telephone: _____

A/H-76b/SEC3.PAC

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION III: LEGAL AUTHORITY AND CONTROL MECHANISM

INSTRUCTIONS: Complete during on-site audit based on POTW interview.

A. Legal Authority

1) Is the POTW's current legal authority (i.e., sewer use ordinance) the same as that in the approved program? __X__ Yes _____ No

If no, provide reasons for any changes: _____

If no, highlight the changes (deletions, additions and changes) on a copy of the ordinance, rules, regulations, etc., and attach them to the checklist.

2) Has the POTW experienced any practical difficulty implementing and enforcing the provisions of its Sewer Use Ordinance (SUO) or other legal authorities? __X__ Yes _____ No

BIG RIVER ZINC - COMPLIANCE DEPENDS ON REMOVAL CREDITS, HOWEVER REMOVAL CREDITS CANNOT BE GRANTED AT THIS TIME.

B. POTW Jurisdiction

1) Is the current jurisdictional situation the same as that documented in the approved program? __X__ Yes _____ No

If no, briefly describe any changes: _____

2) If all the contracts or agreements necessary to regulate IUs in outlying jurisdictions were not officially enacted at the time the program was approved, have they since been enacted?
_____ Yes _____ No __X__ N/A

3) Have procedures been implemented in outlying jurisdictions which adequately address the following:

o Updating industrial waste survey	__X__ Yes	___ No
o Notification of IUs	__X__ Yes	___ No
o Permit issuance	__X__ Yes	___ No
o Receipt and review of IU reports	__X__ Yes	___ No
o Inspection and sampling	__X__ Yes	___ No
o Analysis of samples	__X__ Yes	___ No
o Enforcement	__X__ Yes	___ No

Briefly describe any deficiencies: _____

A/H-76b/SEC3.PAC

SECTION III: LEGAL AUTHORITY AND CONTROL MECHANISM (Continued)

C. Control Mechanism

1) Is the POTW implementing the approved control mechanism (i.e., IU discharge permit system, contracts, etc)? __X__ Yes _____ No

If no, explain: _____

2) Do all of the required IUs have current (unexpired) control documents?
X* Yes ____ No * TWO NEWLY IDENTIFIED SIUS ARE BEING ISSUED THEIR FIRST PERMIT.

If no, explain: _____

Give number control documents issued/number required: 8/10*
*SEE ABOVE

Give number currently expired: 0

3) If the control mechanism is an ordinance only, how are IUs notified of what specific standards and requirements they must meet? _____
N/A

4) Does the POTW have a control mechanism for regulating IUs whose wastes are trucked to the POTW? _____ Yes _____ No X
N/A SEE SEC. 3.10 OF ORDINANCE NO. 567 AT PAGE 23 AND SEC. 4 OF ORDINANCE NO 567 AT PAGES 25 THROUGH 39

Describe the control mechanism : _____

Other Supporting Comments:

C.2 - AS OF MAY 1, 1989, ISSUED 8 PERMITS (IDENTIFIED IN ORIGINAL PROGRAM). TWO NEWLY IDENTIFIED SIUS ARE IN THE PROCESSES OF BEING ISSUED THEIR FIRST PERMITS.

Section III Completed By: _____ Date: 10-26-90
Title: _____ Telephone: _____

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION IV: APPLICATION OF PRETREATMENT STANDARDS

INSTRUCTIONS: Complete during on-site audit based on POTW interview.

A. Industrial User Characterization

1) How often has the POTW updated its Industrial Waste Survey (IWS) to identify new IUs or changes in wastewater discharges? 2 TIMES
MARCH, 1988
JANUARY, 1989

Method used to update survey:

__X__ review of newspaper/phone book
_____ review of plumbing/building permits
__X__ permit reapplication requirements
__X__ onsite inspections
__X__ review of water billing records
__X__ other (describe) LOCAL PLANNING AGENCIES, BUSINESS LISTINGS, TELEPHONE BOOKS

2) Give the current number of IUs of each of the following types:

__6__ # categorical IUs Others might include:
__4__ # significant noncategorical industries
__0__ # other regulated noncategorical IUs
__53__ # other nondomestic users
__63__ # TOTAL

3) Is the POTW's definition of "major" IU the same as in the approved program? __X__ Yes _____ No ____ NA

4) How are categorical IUs identified and categorized?
TRIAL USER SURVEYS, & ON SITE INSPECTIONS

5) Have any new IUs been added since the original IWS which are capable of causing interference or pass through or contribute significantly to the treatment plant's toxic loading? __X__ Yes _____ No

If yes, specify: LANCHEM CORPORATION

6) Have any new IUs been added since the original IWS which are located in outlying jurisdictions where the POTW has no interjurisdictional agreements or IU contracts? _____ Yes __X__ No

If yes, specify: _____

SECTION IV: APPLICATION OF PRETREATMENT STANDARDS (Continued)

B. Local Limits

1) Has the POTW made (or proposed) any changes to its local limits which have have not been approved? _____ Yes __X__ No

(Note that any changes to local limits should be submitted and approved before adoption.)

Describe any unapproved changes (attach copy): _____

2) What was the principal reason for changing or proposing to change limits?
N/A

3) Did the POTW technically evaluate the need for local limits for at least the following six pollutants (See EPA Memorandum, "Local Limits Requirements for POTW Pretreatment Programs," August 5, 1985):
(EVALUATION OF LOCAL LIMITS CURRENTLY UNDERWAY)

		Headworks Analysis Completed?	Local Limits Adopted? Yes	No
_____	Cadmium	_____	_____	_____
_____	Chromium	_____	_____	_____
_____	Copper	_____	_____	_____
_____	Lead	_____	_____	_____
_____	Nickel	_____	_____	_____
_____	Zinc	_____	_____	_____

4) Was site-specific monitoring data used in the calculations?
_____ Yes _____ No __X__ N/A

If yes, indicate types of site-specific data used:
_____ sampling data: _____ influent _____ effluent _____ sludge
_____ ambient receiving water monitoring data
_____ biomonitoring data
_____ priority pollutant analyses
_____ other (specify) _____

5) How did the POTW identify pollutants of concern other than the basic six metals and evaluate the need for local limits for them? FOR IRON, BASED ON SAMPLING AND ANALYSIS OF ABRWTF EFFLUENT AND CONTRIBUTORY INDUSTRIES.

6) If there is more than one treatment plant, were the local limits established specifically for each plant? _____ Yes __X__ No _____ N/A

7) Have there been instances of treatment plant inhibition/upsets during the past year? __X__ Yes _____ No

If yes, briefly describe: BOD AND TUa LIMIT VIOLATIONS. HIGH PHENOLS & ORGANICS LOADINGS. UNCONTROLLED NITRIFICATION

SECTION IV: APPLICATION OF PRETREATMENT STANDARDS (Continued)

8) Does the POTW attempt to determine if such inhibition/upsets are related to industrial wastes and to trace the problem to the IU?
__X*__ Yes _____ No _____ N/A * BOD, PHENOLS, AMMONIA - YES. TUa-NO

9) Have there been instances of pass-through the past year?
__X__ Yes _____ No

If yes, briefly describe: ISOLATED INSTANCES OF PASS THROUGH FOR BOD, PHENOL & IRON. SEE DMR'S

10) If any NPDES permit violations have been caused by discharges of high-strength conventional wastes, what measures are being taken to correct the problem? THE INSTANCES OF BOD EXCURSIONS WERE INVESTIGATED BUT THE CAUSES ARE UNKNOWN. AMMONIA CAUSES/CONTRIBUTES TO TUa VIOLATIONS AND VIOLATIONS OF STATE WQ STANDARDS. REPORT COMPLETED 3/89 TO ALLOCATE AMMONIA BASED ON WATER QUALITY CONSIDERATIONS.

11) Have POTW workers experienced industrial waste related injuries or illnesses? _____ Yes __X__ No
If yes, explain: _____

12) How many times were the following monitored for toxics during the past year?

	AB P-CHEM Influent	AB Effluent	AB Sludge	P-CHEM SLUDGE	MAY 88 - APR. 89
metals	2,900 272	2,900	12	12	
organics	24 12	372	12	12	
biomonitoring		25			
EP toxicity			17	139	

13) Has monitoring at the treatment plant shown a noticeable change in whole effluent toxicity or in the quantity of metals or toxic organics in influent, ~~effluent or sludge~~? __X__ Yes _____ No

If yes, provide details: P-CHEM SLUDGE HAS TEMPORARY INCREASES IN CADMIUM EP-TOX LEVEL WHICH HAS SUBSEQUENTLY BEEN REDUCED TO BELOW 1 MG/L. CARBON ADDITION AT AB HAS REDUCED TOXICITY OF EFFLUENT, BUT NOT TO ITUa.

C. Standards and Requirements for Industrial Users

1) Has the POTW notified its industrial users of the pretreatment standards and requirements they must meet? __X__ Yes _____ No

2) Does the POTW compare local limits against Federal categorical standards and apply the most stringent standards to categorical IUs?
__X__ Yes _____ No _____ N/A

3) Is the method of remaining abreast of categorical regulations adequate to ensure that the POTW is prepared to properly implement categorical standards? __X__ Yes _____ No _____ N/A

4) For industries with combined wastestreams, is the combined wastestream formula being correctly applied? __X__ yes _____ no _____ N/A

SECTION IV: APPLICATION OF PRETREATMENT STANDARDS (Continued)

5) For IUs subject to production-based standards, do limitations in control documents incorporate them properly?
_____ Yes ___X___ No _____ N/A

6) Are all applicable local, State, and Federal standards included in control documents issued to IUs? ___X___ Yes _____ No _____

7) Are TTO standards or alternatives (solvent management plans or oil & grease monitoring) being implemented for IUs subject to TTO limitations?
___X___ Yes _____ No _____ N/A

8) If the POTW has removal credits authority, is it correctly granting removal credits to IUs? _____ Yes _____ No ___X___ N/A

9) If applicable, is the POTW maintaining its approved removal credits efficiency? _____ Yes _____ No ___X___ N/A

10) Has the POTW notified the IUs of RCRA obligations?
___X___ Yes _____ No 11/17/89

11) Are all applicable categorical standards and local limits applied to IUs whose wastes are trucked in to the POTW?
_____ Yes _____ No ___X___ N/A

12) If any of the answers to questions 1-12 are "no", briefly explain: 5 - THE PERMITS FOR MONSANTO AND ETHYL CHEMICALS DO NOT INCORPORATE PRODUCTION-BASED STANDARDS PROPERLY.

13) List below any available EPA guidance materials which the POTW does not have, but should have: _____

Other Supporting Comments:

Section IV Completed By: _____ Date: 10-26-90
Title: _____ Telephone: _____

A/H76d/SEC5.PAC

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION V: COMPLIANCE MONITORING

INSTRUCTIONS: Complete during on-site audit based on POTW interview.

A. Inspection and Monitoring

1) What is the current frequency (attach schedule, if available) for:

	Categorical	# times/year/IU Significant Noncategorical
1. POTW sampling of IUs	(REFER TO SCHEDULE)	(REFER TO SCHEDULE)
2. POTW inspection of IUs	2/YR	2/YR
3. IU self-monitoring	(VARIES WITH FLOW)	(VARIES WITH FLOW)
4. IU reporting	MONTHLY	MONTHLY

2) Are the monitoring and reporting frequencies the same as those described in the approved program?

	Frequency			Reason for Change
	same	less	greater	
1. POTW sampling of IUs	X			
2. POTW inspection of IUs	X			
3. IU self-monitoring	X			
4. IU reporting	X			

3) The following question is optional, at the discretion of the Approval Authority. If any significant or categorical IUs were either not sampled or not inspected within the last year, then list the IUs and provide a reason. (attach additional pages if necessary)

Name of IU	Reason	Date Inspection/ Sampling is Planned
N/A		

4) Are composite samples used to evaluate compliance with categorical standards when appropriate? X Yes _____ No _____ N/A

5) Does the POTW sample for all regulated pollutants? X Yes _____ No (CPS)

6) Are samples split with industrial personnel:
- if requested? X Yes _____ No
- if necessary to verify IU self-monitoring results? X Yes ___ No

7) Are chain-of-custody procedures employed? (attach copy of chain-of-custody form, if available) X Yes _____ No

SECTION V: COMPLIANCE MONITORING (Continued)

9) Indicate where the following pollutant analyses are performed (i.e., inhouse laboratory, contract laboratory, etc.) and method used (AA, GC/MS, wet chemistry, etc.):

metals	IN HOUSE AND CONTRACT LAB	A.A.
cyanide	CONTRACT LAB	WET CHEMISTRY
organics	IN HOUSE CONTRACT LAB	GC GC/MS

10) Is a QA/QC program implemented for sampling? _____ Yes ____ No
for analysis? __X__ Yes _____ No

11) How much time normally elapses between sample collection and obtaining analytical results? IN HOUSE: 1-2 WEEKS/CONTRACT LAB: 2-8 WEEKS

12) Is the Control Authority prepared to take samples on short notice (i.e., vehicles, personnel, preservatives, etc., readily available)?
__X__ Yes _____ No

Briefly describe any deficiencies in demand monitoring capabilities.

_____

_____

13) Are sampling location, techniques, preservatives, etc., clearly detailed for sampling personnel before they take a sample?
__X__ Yes _____ No

Briefly describe any deficiencies in the ability to perform routine compliance monitoring. _____

_____

14) Do the POTW's inspections of IUs consist of?

■ Inspection of manufacturing facility?	__X__ Yes	_____ No
■ Inspection of chemical storage areas?	_____ Yes	__X__ No
■ Evaluation of hazardous waste generation?	_____ Yes	__X__ No
■ Inspection of spill prevention and control procedures?	__X__ Yes	_____ No
■ Inspection of pretreatment facilities?	__X__ Yes	_____ No
■ Inspection of IU sampling procedures?	__X__ Yes	_____ No
■ Inspection of lab procedures?	__X__ Yes	_____ No
■ Inspection of monitoring records?	__X__ Yes	_____ No

B. IU Self-Monitoring and Reporting

1) Are categorical IUs required to sample for all pollutants regulated in the categorical standards? __X__ Yes _____ No _____ N/A

2) Does the POTW routinely review the periodic IU self-monitoring reports and compare the results to the applicable pretreatment standards?
__X__ Yes _____ No _____ N/A

A/H76d/SEC5.PAC

SECTION V: COMPLIANCE MONITORING (Continued)

3) Have the following reports been received from all categorical IUs for which the due date has passed?

	Number Received	Number Required
Baseline Monitoring Reports (BMRs)	6	6
Compliance Schedule Milestone Reports	9	9
90-Day Final Compliance Reports	2	2
Periodic Self-Monitoring Reports	3	3

Is the information contained in these reports analyzed and verified by the POTW? X* Yes _____ No _____ N/A

4) Are IUs required to report spills, slug discharges, etc., to the POTW? X Yes _____ No

5) If the answers to any of questions (1)-(4) is "no", briefly explain: *POTW CLAIMS THAT THESE ARE BEING DONE. HOWEVER, FILES AND RECORDS DO NOT INDICATE THAT THEY ARE.

Other Supporting Comments:

Section V Completed By: _____ Date: 10-26-95

Title: _____ Telephone: _____

A/H76d/SEC6.PAC

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION VI: ENFORCEMENT

INSTRUCTIONS: Complete during on-site audit based on POTW interview.

1) Estimate the number of IUs that are currently in significant noncompliance with pretreatment standards and whether noncompliance results from lack of pretreatment facilities or O&M problems.

	Number of IUs in Noncompliance		
	Total	Lack of Treatment	O&M
a) Noncompliance with Categorical Standards	1	1	0
b) Noncompliance with Local Limits	0	0	0

2) Estimate the number of IUs that are currently in significant noncompliance with:

	Number of IUs in Noncompliance
a) Self-monitoring requirements	0
b) Reporting requirements	0

3) Approximately how many of all the IUs were subject to any kind of enforcement action during the past 12 months? 8

4) Indicate whether the following types of compliance/enforcement actions have been used by the POTW during the past 12 months:

	Yes	No
Verbal warning	X	
Written notice or letter of violation	X	
Issue compliance schedule	X	
Revoke permit		X
Consent decree		X
Civil penalties (fines)		X
Criminal penalties		X
Termination of service		X
Injunctive relief		X
Other (Specify) COMPLIANCE MEETINGS	X	

5) Has the Control Authority used any unusual enforcement techniques that are effective which other POTWs could benefit by knowing about?
_____ Yes __X__ No

If yes, briefly describe: _____

6) Has the POTW published an annual notice of significant violators [40 CFR 403.8(f)(2)(vii)]? __X__ Yes _____ No

7) Does the POTW require the development of compliance schedules when installation of pretreatment facilities or additional O&M is necessary for an IU to achieve compliance with applicable pretreatment standards?
__X__ Yes _____ No

SECTION VI: ENFORCEMENT (Continued)

8) How many IUs are currently on compliance schedules? ___5___

Have any of these IUs been allowed more than 3 years from the effective date of a categorical standard or local limit to achieve compliance?
__X__ Yes ______ No

If yes, provide details: BIG RIVER ZINC AND CERRO COPPER HAVE BEEN ALLOWED LONGER THAN 3 YEARS FROM THE EFFECTIVE DATE OF THEIR CATEGORICAL STANDARD TO ACHIEVE COMPLIANCE.

9) Have all New Source Categorical IUs been compliant from the first day of discharge?______ Yes ______ No __X__ N/A

10) Does the control authority have procedures that define the appropriate enforcement response and time frames to initiate the response for different types of patterns of IU violations? __X__ Yes ______ No (If yes attach a copy). *BUT SUFFICIENT ESCALATION IS NOT OCCURRING.

11) Provide the following information for all significant industrial users (SIUs) currently in significant noncompliance (Attach additional pages if necessary):

Name of SIU	Date of 1st Violation	Enforcement Action Taken to date	Date of Action
CERRO COPPER	AS OF EFFECTIVE DATES FOR COPPER FORMING AND SECONDARY COPPER CATEGORICAL STANDARDS	COMPLIANCE MEETINGS	PERIODICALLY
		COMPLIANCE SCHEDULE IN PERMIT	AUGUST 8, 1988
		UNITED STATES ENFORCEMENT ACTION	MARCH 17, 1989
BIG RIVER ZINC	PSES-3/8/87	PERMIT SCHEDULE	8/8/88 & 2/17/89
AKZO LANCHEM	8/8/88	LETTER	3/23/89

The POTW's annual report may include this information. The appropriate sections of the report may be updated and substituted for the listing described above.

Other Supporting Comments:

Agreement with Region 5 Toxics Violators Program would be patterned after agreement reached with US EPA, now formalized in consent decree signed by Cerro on 9/14/90.

P.T.

A/H76d/SEC7.PAC

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION VII: DATA MANAGEMENT AND PUBLIC PARTICIPATION

INSTRUCTIONS: Complete during on-site audit based on POTW interview.

A. Data Management

1) Are files/records: _____ computerized _____ hard copy __X__ both

2) Does POTW have an ample source of technical documents for implementing its pretreatment program? __X__ Yes _____ No

3) Does the POTW keep apprised of current regulations? __X__ Yes _____ No

If yes, describe how: ENVIRONMENTAL REPORTER BNA, REGULATORY MAILING ADVICE OF COUNSEL, MEMBERSHIP IN PROFESSIONAL SOCIETIES, EG. AMSA & WPCF

4) Are data on permit issuance and compliance status readily available?
YES - PERMIT ISSUANCE
NO - COMPLIANCE STATUS

5) Are inspection and sampling records well organized and readily retrievable? __X__ Yes _____ No

6) Can IU monitoring data be retrieved by:

- Industry name __X__ Yes _____ No
- Pollutant type __X__ Yes _____ No
- Industrial category or type __X__ Yes _____ No
- SIC Code __X__ Yes _____ No
- IU discharge volume __X__ Yes _____ No
- Geographic location __X__ Yes _____ No
- Receiving treatment plant (i.e., if there is more than one plant in the system) __X__ Yes _____ No
- Other (specify) CAS NUMBER, SAMPLING PROGRAMS

7) Are all records maintained for at least 3 years? __X__ Yes _____ No

B. Public Participation

1) Are program records available to the public? __X__ Yes _____ No

2) Have IUs requested that data be held confidential? __X__ Yes _____ No

3) Does the POTW have provisions to address confidentiality?
__X__ Yes _____ No BUT NOT BEING FOLLOWED

4) Has public comment been solicited during revisions to the SUO and/or local limits [403.5(c)(3)]? _____ Yes _____ No __X__ N/A

5) Are there significant public or community issues impacting the POTW's pretreatment program? _____ Yes __X__ No
If yes, please explain: _____

Section VII Completed By: _____ Date: 10-26-90
Title: _____ Telephone: _____

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION VIII: PROGRAM RESOURCES
INSTRUCTIONS: Complete during on-site audit based on POTW interview.

A. Personnel and Equipment

1) Does the POTW have the same or greater resources (full time equivalents and equipment) than was stated in the submission?
__X__ Yes _____ No

If no, describe the nature of the reduced resources: _____

2) Are an adequate number of personnel available for the following program areas:

- IU sampling __X__ Yes _____ No
- IU sampling analyses __X__ Yes _____ No
- IU inspections __X__ Yes _____ No
- Administration (including record keeping/data management) __X__ Yes _____ No
- Legal __X__ Yes _____ No
- Data analysis, review and response __X__ Yes _____ No

3) Do available personnel have appropriate training? __X__ Yes _____ No

4) Is the available sampling equipment adequate? __X__ Yes _____ No

5) Is the available safety equipment adequate? __X__ Yes _____ No

6) Is the number of vehicles available adequate? __X__ Yes _____ No

7) Does the POTW have access to adequate analytical equipment? __X__ Yes _____ No

- Conventional pollutant analysis equipment (i.e., lab oven, precision balance, pH meter) __X__ Yes _____ No
- Atomic absorption spectrophotometer __X__ Yes _____ No
- Gas chromatograph __X__ Yes _____ No
- Gas chromatograph/mass spectrometer __X__ Yes _____ No

B. Funding

1) Is the POTW's annual budget for program implementation the same or greater than that projected in the POTW submission?
_____ Yes __X__ No

If no, describe the reason(s) it is less: THIS IS THE SECOND YEAR OF PROGRAM AND CERTAIN START-UP COSTS ARE NOT INCURRED. SECONDLY, COST IN THE POTW SUBMISSION ARE BEING REIMBURSED BY THE INDUSTRIAL USERS.

SECTION VIII: PROGRAM RESOURCES (Continued)

2) Have any problems in program implementation been observed which appear to be related to inadequate staffing? _____ Yes __X__ No

If yes, describe: _____

_____

3) Is funding expected to continue near the current level?
__X__ Yes _____ No (Increase _____ Decrease _____)

CURRENT LEVEL - $327,000

Other Supporting Comments:

Section VIII Completed By: _____ Date: 10-26-90
Title: _____ Telephone: _____

IU File Review

IU #1 Akzo Coatings America, LanChem Division

Plant mfg. synthetic resins in 4 batches/d. 3/30/88 notice to IU of IWS, 4/25 return requested. Phone calls for failure to submit 4/27, 4/29 & 5/3. Letter ("formal reminder") Sent 5/4. IWS signed 5/6 (no rec'd stamp). 6/27 phone call to assess CPS status. Memo to file 6/28 indicating coverage by 414. 6/29 lette: w/draft permit, fee and completed schedule requested by 7/11. Phone call by H&S to follow-up 7/20 - 7/21. 7/25 LanChem called and promised to expedite. Akzo submits "tentative compliance scheduled 7/26. Schedule has big gaps (9/30/87 - 11/5/90). Fee and monitoring location submitted 7/29. 8/8/88 permit is issued. 6/1/89 IU inspection form documents inspection. Form needs to include sketches, check list items, etc. IPS report required 10/31/88. Monthly Hg/Cn monitoring/rep. LanChem called 10/28 saying above sampling scheduled for 11/1. 12/5 phone memo saying that H.S has seen no data. 12/19 phone memo still no data. 12/21 .03 mg/l phenol - IPS, still no report. 1/12/89 report from Akzo has VOC,phenols, O & G from composite.3/13/89 inspection reviews sampling location and new p.t. system ("ponds"), 3/16 phone memo on "outstanding report submittals; Akzo did 11/1 sampling and 2nd (final) IPS sampling in 1/89. 3/23 letter to Akzo documenting failure to report and requesting schedule for submission. 4/3 letter to Akzo saying violation is not significant. 4/3 letter from Akzo transmitting 2nd IPS. 4/6 phone memo saying Akzo feels 4/3 letter contains schedule requested in 3/23 letter. 4/21 call to Akzo checking on past due (4/15). BMR and compliance schedule report. 4/24 letter requesting ICR by 4/29. 5/4 phone memo Akzo reports the BMR and ICR are near completion: 5/5 BMR signed by Akzo. Note signatory is environmental engineer, no evaluation for 414 comps, used IPS sampling data. 5/30/89 transmittal of application form to Akzo. 6/1/89 routine inspection. 6/1/89 RCRA notice.

IU #2 Lee's Wash Rock, 85 Lyon, E. St. Louis, IL. 62201

Facility is a truck wash, discharging 200,000 gal/mo to sewers. File contains blank review memo. 7/29/88 letter transmitting IWS form "completed" IWS indicating no pollutants 7/29/88 letter from ABRTF, service began 6/17/66, 5/18-6/20 bill = $557.17 1/31/89 letter requesting IWS update.

IU #3 **Musik Plating** 36, 2133 Bond Avenue, E. St. Louis IL. 62207

Facility is a job shop plater doing Bright Ni, Cd, Cu, hard Cr, and electroless Ni plating. BMR dated 6/14/88 estimates process flows @ 10,000 gpd, cooling 8,000 gpd average. Permit issued 8/1/88. 8/27/88 request for 'review' of issuec permit because no TTO's are used @ plant. 9/23/88 letter from H&S to ABRTF recommending grant 'review' and relief requested. 10/6/88 relief granted in letter from Schillinger to Musik (no permit mod appears to have been made). Monthly rpt. 10/27/88 from Musik. 11/30/88 report shows Cu violations, pH probe calibration i.d. as cause. 1/3/89 report "contains" IPS. 1/13/89 phenol local limit report FYI. 2/3/89 phone memo says that PCR has to follow format and organics info needed for IPS. 2/13/89 letter to Musik requests Monthly comp. samp. /IPS/PCR. 2/22/89 letter from Musik says process wastewater - 6,188 gpd. 2/23 letter from Musik submits PCR. 2/13/88 IU inspection to select sampling location, discuss location mods, observe process and treatment and advise more O&M. 3/16 request response to 2/13 letter. 3/23 letter - Musik requiring better pH data, IPS. 3/28 IPS submitted. 4/3 letter reporting violation, not significant violations. 4/5 letter to Sauget identifying Cr violations due to ORP failure. 5/11 'steam exhaust' lines contain NTA & EDTA. Separation fixes problem. 5/30 - Musik req. pp. 6/1/88 RCRA notice.

IU #4 Big River Zinc

Big River Zinc (formerly Amax) is a primary electrolytic zinc refiner. PSES deadline 3/8/87. BMR submitted 9/3/84. CMR 6/88, 12/88. Information meeting o pretreatment ordinance 3/15/88. IWS 3/28/88. Field inspection 7/22/88. Permit 101 issued 8/8/88. Expires 8/8/89. 13 month compliance schedule (9/1/89). No calculation of alternate limits in permit. Amax appeals permit 8/29/88. Permit modified 2/17/89, changes name and compliance schedule. BRZ believes they are i compliance and must do study to show compliance. Final compliance date 2/1/91. Random sampling March 13 and April 10, 1989. Inspections 3/13/89 and 5/30/89. 12/88 CMR showed violations of zinc monthly and maximum in July, November and December. 4/24/89 letter from BRZ to Dave Rankin asking for approval of amended compliance schedule. EPA has no record of receiving it. Permit does not requir compliance immediately as it should. Compliance schedule should be outside the permit.

IU #5 Pfizer

Pfizer produces iron oxides and barite products. Not a categorical user. IWS submitted 3/24/88. Updated 3/22/89. NOV and compliance meeting sent 4/4/88. Local limit violations (7 in February and 8 in March). Meeting notes of compliance meeting (completed 2 of 3 projects), need to do engineering study to reduce ammonia and iron. Pfizer follow-up letter 4/27/88, states local limits don't take effect until 8/4/88 and doing additional projects to reduce iron. 6/7/88 reported spill of acid, letter 6/9/88. May CMR and PCR showed violations of mercury. 6/30/88 letter from Sauget with compliance schedule to handle mercury violations. Inspections 2/17/89 and July 8/18/88; August 9/27/88. Reports due on the 15th of following month.

SECTION IX: POTW FILE REVIEW

INSTRUCTIONS: Review the POTW's files on a representative sample of SIUs (at least 5 files), attempting to include at least two significant noncomplying IUs and two categorical IUs. If the question is correct or should be answered yes, mark with an "X." If the appropriate response is none or no, then mark with "0." Numerical responses may also be required. Narrative comments should be recorded in Part G.

A. File Contents	IU #1	IU #2	IU #3	IU #4	IU #
1) Does the IU file contain:					
*a) Industrial waste survey information	X	X	X	X	X
b) Description of wastewater flows and pollutants?	X	0	X	X	X
*c) Discharge permit application?	X	X	X	X	X
d) Control documents?	X	0[1]	0	X	X
e) POTW sampling results?	X	0	X	X	X
f) POTW inspection report(s)?	X	0	X	X	X
g) IU reports (BMR, 90-day etc.)?	X[1]	NA	X	X	X
h) IU self-monitoring results?	X	0	X	X	X
i) Correspondence?	X	X	X	X	X
j) Telephone log?	X	0	X	X[1]	X[2]
k) Meeting notes?	0	0	0	0	X
l) Determination of IU compliance status?	X[2]	0	X[1]	0	0

*a AND c ARE CONSIDERED THE SAME

B. Control Mechanism Evaluation	IU #1	IU #2	IU #3	IU #4	IU #5
1) Is the IU discharge permit contract, etc., current (i.e., unexpired)?	X	NA	X	X	X
2) Does it cite the POTW's legal authority?	X		X	X	X
3) Does it contain correct discharge limitations?	0[3]		X[2]	X	X
4) Are types of samples for self-monitoring specified?	X		X	X	X
5) Is sample location(s) identified?	X		X[3]	X	X
6) Are applicable IU reporting requirements specified?	X		X[1]	X	X
7) Are standard conditions included for:					
o Right of entry?	X			X	X
o Records retention?	X			X	X
o Penalty provisions?	0			0	0
o Revocation of permit?	0			0	0
o Nontransferability?	X			X	X
o Notice of slug loading?	X			X	X
o Permit expiration date?	X			X	X

SECTION IX: POTW FILE REVIEW (Continued)

C. POTW Compliance Monitoring Evaluation	IU #1	IU #2	IU #3	IU #4	IU #
Within the last twelve months:					
1) How many times was the IU inspected?	2	0	1	3	2
2) Approximately how many sampling visits were made to the IU?	1	0	2	16	4
3) Were all the parameters specified in the control mechanism evaluated?	X	NA	X	X	X
4) Indicate TTO monitoring status*	U	NA	M/S	N	N
5) Are monitoring results well documented?		NA		0	0
o Date sample taken	X		X	X	X
o Type of sample	X		X	0	0
o Sampler name	X		X	0	0
o Condition of sample preservatives added, etc.				0	0
o Chain-of-custody form	X		X	0	0
o Analytical procedures used	0		0	0	0
6) Did the IU inspection report have adequate documentation to support potential enforcement actions?	0	NA	0	0	0
Did it include:					
o Date and time of inspection?	0[4]		0[5]	0[2]	0[4]
o Name of company official contacted?	X		X	X	X
o Verification of production and flow rates, if needed?	0		0	0	0
o Identification of sources and types of wastewater (regulated unregulated, dilution of flow, etc.)?	X		0	0	0
o Problems with pretreatment facilities?	0		X	X[3]	0
o Evaluation of IU self-monitoring equipment and methods?	0		0	X[3]	0
o Other (describe)_____					

D. IU Self-Monitoring Evaluation	IU #1	IU #2	IU #3	IU #4	IU #
1) Have periodic IU self-monitoring reports been submitted?	X[5]		X[6]	X	X
2) Were the required parameters evaluated?	0[6]		X	X	X
3) Did the IU comply with the reporting requirements in the control mechanism?	0		0	X[1]	X[5]

*

* (N) not regulated, (M) monitoring data submitted, (S) solvent management plan submitted, (U) monitoring data/SMP required but not included in file.

SECTION IX: POTW FILE REVIEW (Continued)

E. POTW Enforcement Initiatives	IU #1	IU #2	IU #3	IU #4	IU #5
1) Did the POTW identify all IU violations:					
o In POTW monitoring results?	X	NA	0	0	0
o In IU self-monitoring results?	X		0	0	X
2) Was the IU notified of all violations?	0		0	0	0[6]
3) Was compliance/enforcement action taken by the POTW?	0		0	0	X[7]
4) Did the POTW's action result in the IU achieving compliance within 3 months?	0		NA	0	X

F. Spills/Slug Loading	IU #1	IU #2	IU #3	IU #4	IU #5
1) Has the industry been responsible for spills or slug loads discharged to the POTW?	0		0	0	X[8]
2) If yes, does the file contain documentation regarding:					
a) Notification by the IU of the spill or slug?	NA		NA	NA	X
b) POTW response to notification?	NA		NA	NA	0
c) POTW response to the discharge?	NA		NA	NA	0
d) The effect of the spill on the POTW?	NA		NA	NA	0

Notes:

IU #1

1. BMR is grossly deficient, many compliance reports not submitted.
2. Review of self monitoring data.
3. 40 CFR 414 standards are applied as concentrations.
4. Date only.
5. Four of eight reports submitted.
6. One set of IPS were collected improperly.

IU #2

1. IU was determined to be insignificant. Facility purportedly only washes livestock trucks (per George Schillinger).

IU #3

1. Review of self monitoring data.
2. No CWF review, all flow data needs to be verified (approximately 6000 process of 23, 000 total).
3. Sauget had to conduct inspections to locate and modify sampling location.
4. Permit has not been modified to reflect use of TTO certification.
5. Date only.
6. Not always consistent with requested format.

IU #4

1. No telephone log, just telephone memos.
2. Date only.
3. One inspection mentions these two, others do not.
4. IU is sending in reports, but not on time.

IU #5

1. No BMR.
2. No telephone log, just telephone memos.
3. Also had taken daily ammonia samples in February and April of 1989.
4. Date only.
5. IU is sending in reports, but not on time.
6. Initial iron and mercury violations were identified and the IU was notified. More recent sampling results show a violation and was identified, but the IU was not notified (Mercury - 9-6-88).
7. NOV and compliance meeting in April of 1988 (re: iron).
8. 500 gallons of 12% sulfuric acid.

IU #6 Cerro Copper Products, Route 3, P.O. Box 681

Cerro Copper is a copper recycler. IU permit number 108. Wastewater flow of 400,000 gpd. Under U.S. EPA enforcement. Does not comply with Village requirements as well as Federal requirements.

IU #7 Ethyl Chemical, Monsanto Avenue, Sauget

Ethyl is a categorical industry regulated by 40 CFR 414. IU permit number 102. Wastewater flow of 576,000 gpd. IU has generally complied with sampling requirements. Ongoing spills with no spill prevention plan. Revision to compliance schedule not included in IU permit. Permit limits are not production based.

IU #8 Monsanto, 500 Monsanto Avenue, Sauget

Monsanto is a categorical industry regulated by 40 CFR 414. IU permit number 105. Wastewater flow of 3.6 mgd. Monsanto reports do not provide sufficient information to determine appropriate limits. Permit limits are not production based.

IU #9 Midwest Rubber, 3301 Mississippi Avenue, Sauget

Midwest Rubber is a rubber reclaimer. IU permit number 104. Wastewater flow of anywhere from 50,000 gpd to 600,000 gpd. IU has had spills with no response. Flow values are questionable.

SECTION IX: POTW FILE REVIEW

INSTRUCTIONS: Review the POTW's files on a representative sample of SIUs (at least 5 files), attempting to include at least two significant noncomplying IUs and two categorical IUs. If the question is correct or should be answered yes, mark with an "X." If the appropriate response is none or no, then mark with "0." Numerical responses may also be required. Narrative comments should be recorded in Part G.

A. File Contents	IU #6	IU #7	IU #8	IU #9	
1) Does the IU file contain:					
*a) Industrial waste survey information	X	X	X	X	
b) Description of wastewater flows and pollutants?	X	X	X	X[1]	
*c) Discharge permit application?	X	X	X	X	
d) Control documents?	X	X	X	X	
e) POTW sampling results?	X	X	X	X	
f) POTW inspection report(s)?	X	X	X	X	
g) IU reports (BMR, 90-day etc.)?	X	X	X	X	
h) IU self-monitoring results?	X[1]	X[1]	X	X	
i) Correspondence?	X	X	X	X	
j) Telephone log?	X	X	X	X	
k) Meeting notes?	X	X	X	X	
l) Determination of IU compliance status?	0	0	X	X	

*a & c ARE CONSIDERED THE SAME

B. Control Mechanism Evaluation	IU #6	IU #7	IU #8	IU #9	IU
1) Is the IU discharge permit contract, etc., current (i.e., unexpired)?	X[2]	X[2]	X[1]	X	
2) Does it cite the POTW's legal authority?	X	X	X	X	
3) Does it contain correct discharge limitations?	0	0	0	0	
4) Are types of samples for self-monitoring specified?	X	X	X	X	
5) Is sample location(s) identified?	X	X	X	X	
6) Are applicable IU reporting requirements specified?	X	X	X	X	
7) Are standard conditions included for:					
o Right of entry?	X	X	X	X	
o Records retention?	X	X	X	X	
o Penalty provisions?	X	X	X	X	
o Revocation of permit?	X	X	X	X	
o Nontransferability?	X	X	X	X	
o Notice of slug loading?	X	X	X	X	
o Permit expiration date?	X	X	X	X	

SECTION IX: POTW FILE REVIEW (Continued)

C. POTW Compliance Monitoring Evaluation	IU #6	IU #7	IU #8	IU #9	IU #
Within the last twelve months:					
1) How many times was the IU inspected?	4	1	1	2	
2) Approximately how many sampling visits were made to the IU?	3[3]	3[3]	3[2]	1	
3) Were all the parameters specified in the control mechanism evaluated?	X	X	X	X	
4) Indicate TTO monitoring status*	M	N	N	N	
5) Are monitoring results well documented?	X	X	X	X	
o Date sample taken	X	X	X	X	
o Type of sample	O	O	O	O	
o Sampler name	O	O	O	O	
o Condition of sample preservatives added, etc.	O	O	O	O	
o Chain-of-custody form	X	X	X	X	
o Analytical procedures used	X	X	X	X	
6) Did the IU inspection report have adequate documentation to support potential enforcement actions? Did it include:	O	O	O	O	
o Date and time of inspection?	O[4]	O[4]	O[3]	O[2]	
o Name of company official contacted?	X	X	X	X	
o Verification of production and flow rates, if needed?	O	O	O	O	
o Identification of sources and types of wastewater (regulated unregulated, dilution of flow, etc.)?	O	O	O	O	
o Problems with pretreatment facilities?	X	O	O	O	
o Evaluation of IU self-monitoring equipment and methods?	O	O	O	O	
o Other (describe)_____					

D. IU Self-Monitoring Evaluation	IU #6	IU #7	IU #8	IU #9	IU #
1) Have periodic IU self-monitoring reports been submitted?	X	X	X	X	
2) Were the required parameters evaluated?	O[5]	O[5]	X	X[1]	
3) Did the IU comply with the reporting requirements in the control mechanism?	O	X	X	X	

* (N) not regulated, (M) monitoring data submitted, (S) solvent management plan submitted, (U) monitoring data/SMP required but not included in file.

SECTION IX: POTW FILE REVIEW (Continued)

E. POTW Enforcement Initiatives	IU #6	IU #7	IU #8	IU #9	IU #
1) Did the POTW identify all IU violations:					
o In POTW monitoring results?	O	O	O	O	____
o In IU self-monitoring results?	O	O	O	O	____
2) Was the IU notified of all violations?	O	O	O	O	____
3) Was compliance/enforcement action taken by the POTW?	O	O	O	O	____
4) Did the POTW's action result in the IU achieving compliance within 3 months?	O	O	O	O	____

F. Spills/Slug Loading	IU #6	IU #7	IU #8	IU #9	IU #
1) Has the industry been responsible for spills or slug loads discharged to the POTW?	X	X	O	X	____
2) If yes, does the file contain documentation regarding:					
a) Notification by the IU of the spill or slug?	X	X	NA	X	____
b) POTW response to notification?	O	O	NA	O	____
c) POTW response to the discharge?	O	O	NA	O	____
d) The effect of the spill on the POTW?	O	O	NA	O	____

Notes:

IU #6

1. Often received incomplete.
2. Region V has asked for modification.
3. In addition, phenols/ammonia sampling programs.

IU #7

1. Often received incomplete.
2. Region V has asked for modification.
3. In addition, phenols/ammonia sampling programs.
4. Date only.
5. Deficient.

IU #8

1. Region V has asked for modification.
2. In addition, phenols/ammonia sampling program.
3. Date only.

IU #9

1. Flows must be recalculated.
2. Date only.
3. Deficient.

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION X: EVALUATION AND SUMMARY

INSTRUCTIONS: Complete during or after on-site audit based on reviewer's analysis of program documentation and implementation. Distinguish between required POTW actions necessary to achieve compliance with the POTW permit, approved program, or General Pretreatment Regulations and recommended actions to improve or refine the existing program.

A. Legal Authority and Control Mechanism (Section III)

1) Does the POTW have adequate legal authorities to implement and enforce pretreatment standards and requirements upon all nondomestic/industrial users (i.e., mobile sources, IUs in outside jurisdictions)?
__X__ Yes _____ No

2) If the POTW's legal authority has been changed since program approval, does it still have the requisite authorities per 40 CFR 403.8(f)(1) to:

	Yes	No
o Deny or condition new or increased contributions (i)	___	___
o Apply and enforce pretreatment standards (ii)	___	___
o Control each IU through permit, contract, etc. (iii)	___	___
o Require development of IU compliance schedules (iv)(A)	___	___
o Require submission of IU reports (iv)(B)	___	___
o Conduct IU inspections and sampling (v)	___	___
o Obtain remedies for noncompliance (vi)(A)	___	___
o Halt or prevent discharges (vi)(B)	___	___
o Comply with confidentiality requirements (vii)	___	___

3) Have effective procedures been established to implement interjurisdictional agreements? __X__ Yes _____ No _____ N/A

4) Has the POTW implemented an adequate control mechanism to regulate:

	Yes	No	
o Categorical industrial users?	___	X	
o Significant noncategorical industrial users?	X	___	
o Waste haulers?	___	___	NA

5) Has the POTW issued all of the necessary control documents?
_____ Yes __X__ No

A. con't

6) Describe <u>required</u> POTW actions necessary to achieve compliance with legal authority requirements:

ISSUE PERMITS WITH APPROPRIATE MASS-BASED LIMITS TO MONSANTO AND ETHYL CHEMICAL. ISSUE PERMITS FOR ROGERS CARTAGE CO. AND CLAYTON CHEMICAL CO. ELIMINATE COMPLIANCE SCHEDULES FROM CERRO COPPER AND BIG RIVER ZINC AND ESCALATE ENFORCEMENT RESPONSE. ESCALATE ENFORCEMENT RESPONSE VERSUS LANCHEM, MONSANTO AND PFIZER.

ADOPT LOCAL LIMIT FOR AMMONIA TO BE APPLIED TO MONSANTO, PFIZER AND TRADE WASTE. MODIFY PERMIT FOR MONSANTO AND PFIZER TO INCLUDE LOCAL LIMIT FOR AMMONIA.

7) Describe <u>recommended</u> POTW actions to improve the existing legal authority and interjurisdictional agreements.

VILLAGE SHOULD TRY TO GET A PREAPPROVAL/BLANKET APPROVAL FOR RIGHT OF ENTRY.

SECTION X: EVALUATION AND SUMMARY (Continued)

B. Application of Pretreatment Standards (Section IV)

1) Has the POTW developed technically based local limits that will sufficiently protect the POTW treatment plant from interference, pass through, and sludge contamination and protect worker safety [403.5(c) and (d)]?

_____ Yes __X__ No SAMPLING FINISHED. PROPOSAL UNDER REVIEW.

2) Are pretreatment standards (local limits and categorical standards) being properly applied to all industrial users, including:

	Yes	No
o Correct categorization of industries	X	___
o Application of more stringent standard (local limits vs. categorical standards)	X	___
o Designation of proper sampling location(s)	NOT EVALUATED EXCEPT	
o Application of production-based standards	X OCPSF	
o Use of the combined wastestream formula	NOT EVALUATED	
o Sample type and frequency	X	___
o Use of an effective control mechanism [(403.8(f)(1)(iii)]	X	___
o Other? _____		

3) Is the POTW implementing adequate procedures per 40 CFR 403.8(f)(2) to:

	Yes	No
o Identify and locate all IUs (i)	X	___
o Notify IUs of all applicable standards and requirements including RCRA (iii)	X	___

4) Describe required POTW actions necessary to adequately apply pretreatment standards:

REVISE PERMITS FOR MONSANTO, ETHYL CHEMICAL AND LANCHEM TO HAVE MASS-BASED LIMITS IN ACCORDANCE WITH 40 CFR 414. BIG RIVER ZINC AND CERRO COPPER PERMITS MUST BE MODIFIED TO REQUIRE COMPLIANCE WITH CATEGORICAL STANDARDS IMMEDIATELY.

ADOPT AND APPLY AN AMMONIA LOCAL LIMIT TO MONSANTO, PFIZER AND POSSIBLY TRADE WASTE.

5) Describe recommended POTW actions to improve the POTWs application of pretreatment standards:

SECTION X: EVALUATION AND SUMMARY (Continued)

C. Compliance Monitoring (Section V)

1) Does the POTW perform (in combination with IU self-monitoring) adequate inspections and sampling of its IUs, consistent with 40 CFR 403.8(f)(2), to:

	Yes	No
o Identify the character and volume of pollutants from all IUs (ii)	___	X
o Receive and review industrial user reports (iv)	MAYBE	
o Assess industrial user compliance (v)	MAYBE	
o Investigate instances of noncompliance (vi)	X	___
o Produce admissible evidence in an enforcement action (vi)	X	___

2) Does the POTW implement the categorical IU reporting requirements as specified in 40 CFR Part 403.12? _____ Yes _____ No
NOT EVALUATED

3) Describe required POTW actions necessary to comply with all compliance monitoring requirements: **Review IU reports in a timely fashion and document results of such reviews.**

4) Describe recommended POTW actions to improve the POTW's compliance monitoring program: **Inspection of chemical storage areas. Evaluation of hazardous waste generation. Inspection reports should have process logs and visual observations using a camera.**

D. Enforcement (Section VI)

1) In the event of IU noncompliance, does the POTW take appropriate and necessary enforcement action to bring IUs back into compliance in a timely manner? _____ Yes ___X___ No

SECTION X: EVALUATION AND SUMMARY (Continued)

2) Describe required POTW actions necessary for proper enforcement of all pretreatment standards and requirements:

ENFORCEMENT ACTIONS MUST BE ESCALATED IN ACCORDANCE WITH THE STANDARD OPERATING PROCEDURE AGAINST BIG RIVER ZINC AND LANCHEM.

ENFORCEMENT ACTION MUST BE TAKEN AGAINST MONSANTO AND PFIZER FOR PASS THROUGH VIOLATIONS.

3) Describe recommended POTW actions to improve enforcement of pretreatment standards and requirements:

E. Data Management and Public Participation (Section VII and IX)

1) Does implementation of the POTW's pretreatment program include:

	Yes	No
o Annual publication of significant violators [403.8(f)(2)(vii)]	X	
o Notice to interested parties when local limits are developed [403.5(c)(3)]	X	
o Adequate procedures for handling confidential information [403.14(a)]		X
o Unrestricted access to effluent data provided to the public [403.14(b)	X	
o Maintenance of records for at least three years [403.12(n)(2)]	X	
o Well documented activities in IU files	X	

2) Describe required POTW actions necessary for compliance with data management and public participation requirements:

CONFIDENTIAL INFORMATION HANDLING MUST BE IMPROVED.

SECTION X: EVALUATION AND SUMMARY (Continued)

3) Describe recommended POTW actions to improve data management and public participation:

LETTERS RECEIVED SHOULD BE DATE STAMPED. FILES SHOULD HAVE SIGNED COPIES OF LETTERS SENT. IF LETTERS ARE SENT CERTIFIED, THEY SHOULD HAVE THE CERTIFIED LETTER NUMBER.

F. Program Resources

1) Does the POTW have adequate personnel, equipment, supplies, and funding and technical guidance documents to effectively implement all elements of its pretreatment program [40 CFR 403.8(f)(3)]?
__X__ Yes _____ No

2) Describe the required POTW actions necessary to comply with all resource requirements:

3) Describe recommended POTW actions to improve its ability to implement its pretreatment program:

Section X Completed By: _____ Date: 10-26-90

Title: Env. Eng. Telephone: 312-886-6106

A/H76d/SUPDOC.PAC

SUPPORTING DOCUMENTATION FOR
AUDIT CHECKLIST

X	NPDES permit conditions for pretreatment program development or implementation (II.A)
	Copy of administrative order, consent decree or other document containing pretreatment program requirements (II.A)
X	Copy of POTW SUO if changed since program approval (III.A) (Highlight the changes that have been incorporated).
	Copy of local limits if changed since program approval (IV.B)
X	POTW sampling and inspection schedule for required IUs (V.A)
	List of all IUs not sampled or not inspected in the past year (V.A) (Optional)
	Copy of POTW chain-of-custody form (V.A)
	List of all noncompliant industries and history of enforcement actions taken (VI)

APPENDIX B

VILLAGE OF SAUGET NPDES PERMIT PRETREATMENT REQUIREMENTS

Special Conditions

4. Carry out inspection, surveillance, and monitoring procedures which will determine, independent of information supplied by the industrial user, whether the industrial user is in compliance with the pretreatment standards.

5. Require development, as necessary, of compliance schedules by each industrial user for the installation of control technologies to meet applicable pretreatment standards.

6. Maintain and update, as necessary, records identifying the nature and character of industrial user discharges.

7. Obtain appropriate remedies for noncompliance by any industrial user with any pretreatment standard and/or requirement; and

8. Provde a quarterly report briefly describing the permittee's pretreatment program activities over the previous quarter. Where multiple plants are involved, one annual report summarizing activities may be submitted. However, there may be plant-specific monitoring requirements. Each report shall be submitted no later than 1 month after the end of the calendar quarter that it covers, shall be in the format set forth in IEPA's annual POTW Pretreatment Report Package, and shall contain the following information:

   a. An updated listing of the permittee's industrial users.

   b. A descriptive summary of the compliance activities, including numbers of any major enforcement actions (i.e., administrative orders, penalties, civil actions, etc.) and the outcome of those actions. This shall include an assessment of the compliance status of the permittee's pretreatment program in meeting its needs and objectives.

   c. A description of all substantive changes made to the permittee's pretreatment program description referenced above. Any such changes may not be implemented without prior approval. Substantive changes include, but are not limited to, any change in any ordinance, major modification in the program's administrative structure or operating agreement(s), a significant reduction in monitoring, or a change in the method of funding the program.

   d. Results of POTW sampling and anaylsis of influent, effluent, and sludge.

   e. Results of completion of ABRTF and tie-in of discharges from other facilities.

Special Conditions

SPECIAL CONDITION 12. For Discharge No. 002: BOD and Suspended Solids (85% removal required): The arithmetic mean of the values for effluent samples collected in a period of one calendar month shall not exceed 15 percent of the arithmetic mean of the values for influent samples collected at approximately the same time during the same period. The percent removal need not be reported to the Agency on Discharge Monitoring Reports (DMR's) but influent and effluent data must be available, as required elsewhere in this permit, for Agency inspection and review. (If interim limitations are included in this permit, this Special Condition will apply to the final limitations only.)

SPECIAL CONDITION 13: This permit may be modified, following public notice and opportunity for hearing, to incorporate the requirements of an approved Industrial Pretreatment Program. In the interim, the Village shall complete the following tasks:

1. Once written approval of the local sewer use ordinance is given by the IEPA and USEPA Region V, the Village shall enact this ordinance and commence the permit issuing activities for its significant inudstrial users as defined in the proposed ordinance. All deadline dates specified by the ordinance shall be enforced and all items required on permit applications to be filed by industrial users shall be obtained from the applicants.

   This permit application information shall be obtained, summarized, and submitted, within 6 months of the completion of the ABRTF or no later than September 30, 1986, to fulfill the requirements of a complete industrial user survey, which is a requirement of an approved Pretreatment Program. In addition, all tributary communities shall enact equivalent ordinances.

2. POTW Monitoring requirements for toxics as part of an approved pretreatment program will be included with the next modification.

3. The Village shall conduct all samplings necessary to calculate local limits applicable at industrial end-of-pipe discharges for the facilities connected to the Sauget, Regional, E. St. Louis, and Cahokia plants. The Village shall use guidance provided by the IEPA when developing these l its and the calculated loadings shall be submitted and approved by the IEPA and USEPA Region V prior to adoption in the sewer use ordinance, which shall be developed within one year of the completion of the Regional plant.

APPENDIX C

VILLAGE OF SAUGET
ORDINANCE LIMITS

3.2.2.5) Any noxious or malodorous liquids, gases, or solids which either singly or by interaction with other wastewaters are sufficient to create a public nuisance or hazard to life or are sufficient to prevent entry into sewers for their maintenance and repair.

3.2.2.6) In no case shall a substance be discharged in such quantities to the POTW as to cause the POTW to be in noncompliance with sludge or scum disposal criteria, guidelines or regulations developed under Section 405 of the Act, any criteria guidelines or regulations affecting sludge or scum disposal developed pursuant to the RCRA, SWDA, the Clean Water Act, the Toxic Substances Control Act, or State regulations Subtitle C Part 391 applicable to the sludge management method being used.

3.2.2.7) Any Wastewater having a temperature at the point of discharge to the POTW which will inhibit biological activity in the POTW treatment plant resulting in Interference; in no case shall wastewater be introduced to the POTW which exceeds 40° C (104° F) at the POTW treatment plant.

3.2.2.8) Any slug discharged to the POTW.

3.2.2.9) Any wastewater containing any radioactive wastes or isotopes of such halflife or concentration as may exceed limits established by State or Federal regulations.

3.2.2.10) Any wastewater containing concentrations of fat, oil, grease (FOG) or trichlorotrifluoroethane extractable material which is sufficient to cause Interference to the POTW or to cause a violation of the POTW's NPDES Permit.

3.2.2.11) Any wastewater containing BOD, total solids, or suspended solids of such character and quantity that unusual attention or expense is required to handle such materials at the POTW treatment plant; provided, however, that a User may be permitted by specific, written agreement with the POTW, which agreement to discharge such BOD or TSS may provide for special charges, payments or provisions for treating and testing equipment.

3.2.2.12) Any discharge exceeding the standards established in 35 Ill. Adm. Code 307 from time to time.

3.2.3) Compliance with the provisions of this Section 3.2 shall be required on the effective date of this Ordinance.

3.3 SPECIFIC LIMITATIONS ON DISCHARGE

3.3.1) Specific limitations shall be developed pertaining to each separate discharge or flow-weighted combined discharge of a User as are deemed appropriate by the POTW to assure proper

functioning of the POTW and compliance with the Prohibitive Discharge Standards of Section 3.2 and the applicable General Pretreatment Regulations. (40 CFR 403)

3.3.2) Specific effluent limits shall not be developed and enforced without individual notice to persons or groups who have requested such notice and an opportunity to respond.

3.3.3) Pfizer Inc. Iron Discharge Limitation
The flow weighted iron concentration of all wastewater discharged from the Pfizer Inc. East St. Louis facility to the Regional System shall not exceed a daily maximum of 560 mg/l.

3.3.4) Compliance with the provisions of this Section 3.3 shall be required as soon as possible but no later than 180 days after the effective date of each standard, as each standard is established by the POTW. Compliance schedules may be established to return noncompliant Industrial Users to compliance with the Provisions of this Section as soon as possible, but in no case later than three years from the beginning of the Compliance Schedule.

3.4 INCORPORATION OF NATIONAL CATEGORICAL PRETREATMENT STANDARDS

Upon the promulgation of the National Categorical Pretreatment Standard for a particular Industrial User, the said standard, when effective shall be enforceable under this Ordinance and said standards shall be complied with by all Industrial Users subject to each of said National Categorical Pretreatment Standards. The POTW shall notify all known affected Users of the applicable reporting requirements under 40 CFR Section 403.12. Failure of the POTW to notify the User shall not relieve the User of his duty, if any, to comply.

3.5 MODIFICATION OF NATIONAL CATEGORICAL PRETREATMENT STANDARDS

At such time as USEPA repromulgates final removal credit regulations currently contained at 40 CFR Section 403.7, this Pretreatment Ordinance shall be amended to provide for the modification of National Categorical Pretreatment Standards.

3.6 FINAL NATIONAL CATEGORICAL PRETREATMENT STANDARDS

Listed below are the compliance dates relating to the pretreatment standards for existing sources (PSES) that have been promulgated for the regulated industrial categories. For all new sources regulated under the national categorical pretreatment standards (NCPS), the compliance date for the applicable pretreatment standards for new sources (PSNS) shall be the day the new source commences discharge.

APPENDIX D

VILLAGE OF SAUGET
SAMPLING SCHEDULE

Self-Monitoring) except where the POTW specifically agrees to assume sampling responsibilities for the SIU. It is the intent of the POTW to utilize existing POTW sampling and laboratory facilities where possible. In establishing monitoring frequencies the POTW shall consider the compliance history of the SIU, the cost of monitoring, availibility of POTW equipment and manpower, impact of the SIU on the POTW, and the SIU discharge flow rate. First year SIU sampling frequencies are given below. These frequencies shall apply to all parameters to which the SIU is subject to any specific limitation contained in Part 300 of the Village of Sauget Pretreatment Ordinance.

SIU Flow, gpd	Conventional Pollutants, Metals, Cyanide and Phenols	Organics
0-10,000	1/month	2/yr
10,001-50,000	1/month	2/yr
50,001-100,000	2/month	4/yr
100,001-240,000	1/week	6/yr
over 240,000	1/week	1/month

Pollutants not reasonably expected to be present (ie. not used or produced by the SIU) shall initially be subject to a minimal sampling frequency. Self-monitoring frequencies and parameters shall be included in the SIU's Wastewater Discharge Permit. Compliance monitoring results and frequencies shall be reviewed annually by the POTW and appropriate adjustments made to frequency and parameters in the SIU's Wastewater Discharge Permit.

B. Random Sampling: The POTW Plant Manager shall order the Pretreatment Sampling Technician to secure ~~one (1)~~ random samples, at the POTW Plant Manager's discretion. ~~but not less often than annually, from each S.I.U. The sample shall be a twenty-four (24) hour, composite sample taken with one (1) of two (2) portable samplers.~~ First year SIU random sampling frequencies are given below. These frequencies shall apply to all parameters to which the SIU is subject to any specific limitation contained in Part 300 of the Village of Sauget Pretreatment Ordinance.

SIU Flow, gpd	Conventional Pollutants, Metals, Cyanide and Phenols	Organics
0-100,000	4/yr	1/yr
over 100,000	1/mo	2/yr

Random sampling frequencies for each SIU shall be reviewed annually and appropriate adjustments (based on SIU compliance history) made by the POTW. Samplers shall be temporarily suspended within the manhole and the lid to the manhole locked in place to preclude tampering. Flow of the combined waste stream shall be approximated by a portable recorder and combined waste stream back calculations performed by the Association Engineer to determine compliance of each tributary waste stream based on BMR data. Should random sample data be challenged by the SIU in such a manner as to reasonably question the validity or representitiveness of the sample data, additional random sampling shall be performed conforming to Section 4c of the Enforcement SOP.

C. Demand Sampling: Demand sampling shall be performed when ordered by the POTW Plant Manager. He may initiate such sampling at his discretion when he feels that an I.U. is in violation, an upset has occurred, or on the basis of public complaint. Such sampling shall be